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September 9, 2020

BY ECF

Honorable Steven Tiscione
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Hernandez, et al. v. Marcofai Corp., et al.
17-cv-887 (GRB) (ST)

Dear Judge Tiscione:

This firm represents Plaintiffs in the above-referenced matter. Plaintiffs write jointly with Defendants pursuant to the Court's order of September 2, 2020. Parties propose the following schedule for outstanding discovery:

1. Responses to Request for Document Production and Interrogatories due by November 30, 2020
2. Depositions to be completed by January 31, 2021

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Clela Errington
Clela A. Errington, Esq.
Michael Faillace & Associates, P.C.

cc: Sim Shapiro, Esq. (via ECF)
Attorneys for Defendants